ENV-2021-WLG-000022

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the First

Schedule of the Act in relation to a decision of Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons

One Plan

BETWEEN ANDREW DAY

Appellant

AND MANAWATŪ-WHANGANUI REGIONAL

COUNCIL

Respondent

Environment Court

- Horticulture New Zealand ("HortNZ") wishes to be a party pursuant to section 274 of the Resource Management Act 1991 ("RMA") to the following proceedings:
 - (a) Andrew Day v Manawatū-Whanganui Regional Council (ENV-2021-WLG-000022) being an appeal against decisions of the Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons One Plan.
- HortNZ made submissions and further submissions on Proposed Plan Change 2 to the One Plan (submission number 66 and further submission number FS4).
- HortNZ also has an interest in these proceedings that is greater than the general public as it represents interest groups in the community that are likely to be affected by the proposed relief sought by the Respondent.
- HortNZ is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 5. The part of the decision that Andrew Day is appealing is:
 - (a) "All of Plan Change 2 with the exception of the use of Overseer 6.2.3 to update Table 14.2 (but not the values themselves within Table 14.2)"
- 6. HortNZ is interested in all of the of the proceedings.
- 7. HortNZ opposes the relief sought because, HortNZ supports the decision version of PC2 with regard to the regulation of

commercial vegetable growing (including recognition of food security and crop rotation) as this provides a viable consenting framework that will deliver water quality benefits – ahead of the NPSFM 2020 catchment limit setting plan changes required by 2024.

8. HortNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



Michelle Sands

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24 June 2021

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ENV-2021-WLG-000023

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the First

Schedule of the Act in relation to a decision of Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons

One Plan

BETWEEN WELLINGTON FISH AND GAME COUNCIL

Appellant

AND MANAWATŪ-WHANGANUI REGIONAL

COUNCIL

Respondent

Environment Court

- Horticulture New Zealand ("HortNZ") wishes to be a party pursuant to section 274 of the Resource Management Act 1991 ("RMA") to the following proceedings:
 - (a) Wellington Fish and Game Council v Manawatū-Whanganui Regional Council (ENV-2021-WLG-000023) being an appeal against decisions of the Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons One Plan.
- HortNZ made submissions and further submissions on Proposed Plan Change 2 to the One Plan (submission number 66 and further submission number FS4).
- HortNZ also has an interest in these proceedings that is greater than the general public as it represents interest groups in the community that are likely to be affected by the proposed relief sought by the Respondent.
- HortNZ is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 5. The part of the decision that Fish and Game are appealing is:
 - (a) "All of the Proposed Plan Change except the changes proposed to Table 14.2 ("Cumulative nitrogen leaching maximum by Land Use Capability Class")".
- 6. HortNZ is interested in all of the of the proceedings.

- 7. HortNZ opposes the relief sought because, HortNZ supports the decision version of PC2 with regard to the regulation of commercial vegetable growing (including recognition of food security and crop rotation) as this provides a viable consenting framework that will deliver water quality benefits ahead of the NPSFM 2020 catchment limit setting plan changes required by 2024.
- 8. HortNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.

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ENV-2021-WLG-000021

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the First

Schedule of the Act in relation to a decision of Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons

One Plan

BETWEEN NGĀTI TURANGA

Appellant

AND MANAWATŪ-WHANGANUI REGIONAL

COUNCIL

Respondent

Environment Court

- Horticulture New Zealand ("HortNZ") wishes to be a party pursuant to section 274 of the Resource Management Act 1991 ("RMA") to the following proceedings:
 - (a) Ngāti Turanga v Manawatū-Whanganui Regional Council (ENV-2021-WLG-000021) being an appeal against decisions of the Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons One Plan.
- HortNZ made submissions and further submissions on Proposed Plan Change 2 to the One Plan (submission number 66 and further submission number FS4).
- HortNZ also has an interest in these proceedings that is greater than the general public as it represents interest groups in the community that are likely to be affected by the proposed relief sought by the Respondent.
- HortNZ is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 5. The part of the decision that Ngāti Turanga are appealing is:
 - (a) Plan Change 2 (decisions version) be refused except for:
 - i. The recalibration of CMLN in Table 14.2, and
 - ii. Transitional pathway to deintensification in Policy 14-6(d)(ii)
 - (b) Seeking that all subzones of the Coastal Manawatū surface water management zones (Mana_13) are added to One Plan Table 14.1.

- (c) Or, secondary relief as detailed in "Appendix 1".
- 6. HortNZ is interested in all of the of the proceedings.
- 7. HortNZ opposes the relief sought because, HortNZ supports the decision version of PC2 with regard to the regulation of commercial vegetable growing (including recognition of food security and crop rotation) as this provides a viable consenting framework that will deliver water quality benefits ahead of the NPSFM 2020 catchment limit setting plan changes required by 2024.
- 8. HortNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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ENV-2021-WLG-000020

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the First

Schedule of the Act in relation to a decision of Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons

One Plan

BETWEEN TE RUNANGA O RAUKAWA

Appellant

AND MANAWATŪ-WHANGANUI REGIONAL

COUNCIL

Respondent

Environment Court

- Horticulture New Zealand ("HortNZ") wishes to be a party pursuant to section 274 of the Resource Management Act 1991 ("RMA") to the following proceedings:
 - (a) Te Runanga o Raukawa v Manawatū-Whanganui Regional Council (ENV-2021-WLG-000020) being an appeal against decisions of the Manawatū-Whanganui Regional Council on Proposed Plan Change 2 to the Horizons One Plan.
- HortNZ made submissions and further submissions on Proposed Plan Change 2 to the One Plan (submission number 66 and further submission number FS4).
- HortNZ also has an interest in these proceedings that is greater than the general public as it represents interest groups in the community that are likely to be affected by the proposed relief sought by the Respondent.
- HortNZ is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 5. The part of the decision that Te Runanga o Raukawa are appealing is:
 - (a) Plan Change 2 (decisions version) be refused except for:
 - i. The recalibration of CMLN in Table 14.2, and
 - ii. Transitional pathway to deintensification in Policy 14-6(d)(ii)

(b) Seeking that all subzones of the Coastal Manawatū surface water management zones (Mana_13) are added to One Plan Table 14.1.

(c) Secondary relief detailed in "Appendix 1".

6. HortNZ is interested in all of the of the proceedings.

7. HortNZ opposes the relief sought because, HortNZ supports the decision version of PC2 with regard to the regulation of commercial vegetable growing (including recognition of food security and crop rotation) as this provides a viable consenting framework that will deliver water quality benefits – ahead of the NPSFM 2020 catchment limit setting plan changes required by 2024.

8. HortNZ agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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